

of ordinary skill in the art to place the polythiophene layer of Jonas et al. over the substrate as claimed or as taught by Tarumi et al. In addition, the tertiary reference to Newkirk, also does not provide the motivation of one of ordinary skill in the art to place the polythiophene layer of Jonas et al. over the layers as taught by Tarumi et al.

Tarumi et al. teaches a toner carrier having substrate materials including fluoropolymers, chloropolymers, silicone rubbers, polyarylenes, ethylene diene propene monomers, nitrile rubbers, and mixtures thereof. On the other hand, Jonas et al. teaches electrode substrates of glass or plastic films (e.g. polyesters such as polyethylene terephthalate or polyethylene naphthalate, polycarbonate, polyacrylate, polysulphone or polyimide). Newkirk teaches substrates made of metals. Therefore, none of the references provide motivation for combining a polythiophene outer layer with the substrates as taught by Tarumi et al. or as claimed.

In addition, there would have been no expectation for success that a polythiophene layer as taught by Jonas et al. in connection with the above-listed substrate materials, would work well with the substrate materials disclosed by Tarumi et al. The present application provides that such a combination of coatings, as claimed, allows for easier release or transfer of images. There would not have been any expectation that the claimed combination would result in improved release or transfer.

In view of the above arguments, Applicants submit that the claims are not obvious in view of the cited references. Accordingly, Applicants request withdrawal of the rejection of claims 1, 4-14, 17-19, and 21-25 under 35 U.S.C. §103(a) over Tarumi et al. in view of Jonas et al. and Newkirk.

In view of the above arguments, Applicants submit that all claims should now be in condition for allowance. Early indication of allowability is respectfully requested.

No additional fee is believed to be required for this amendment. However, the undersigned Xerox Corporation Attorney hereby authorizes the charging of any necessary fees, other than the issue fee, to Xerox Corporation Deposit Account No. 24-0025. This also constitutes a request for any needed extension of time and authorization to charge all fees therefor to Xerox Corporation Deposit Account No. 24-0025.

In the event the Examiner considers personal contact advantageous to the disposition of this case, s/he is hereby authorized to call Applicant's Attorney, Annette L. Bade, at telephone number (310) 333-3682, El Segundo, California.

Respectfully submitted,

A handwritten signature in black ink, appearing to be 'Annette L. Bade', written over a horizontal line.

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